

**EXHIBIT 5-g to PLAINTIFFS’
APPENDIX OF EXPERT REPORTS**

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VIA E-MAIL

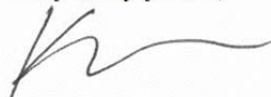
Carl R. Metz
Williams & Connolly, LLP
725 Twelfth Street, N.W.
Washington, D.C. 20005-5901

RE: *City of Huntington, et al. v. AmerisourceBergen Drug Corp., et al.*
Materials for Dr. Katherine Keyes

Dear Mr. Metz:

In response to your September 22, 2020 letter, please find enclosed the requested calculations related to Dr. Katherine Keyes' sensitivity tests. We disagree with your characterization of Dr. Keyes' testimony, the purported "relevance" of the sensitivity tests, and the assertion that the previous production was incomplete. Contrary to your letter, Dr. Keyes did not testify that the calculations were "relevant" to her analyses. All of the calculations relevant to Dr. Keyes' report were provided in the workbook that you received several weeks ago.

Very truly yours,



Kelly K. McNabb

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* suppressed values were set to 5

					Only synthetic opioids / all Rx opioids (We used WV rates as Cabell rates were based on small numbers)
	All opioids: T40.0-T40.4	Rx opioids including synthetic: T40.2, T40.3, T40.4	Rx opioids not including synthetic: T40.2, T40.3	Synthetic opioids only: T40.2-T40.4 minus T40.2 and T40.3	
1999	5	5	5	0	0.44444444
2000	5	5	5	0	0.18918919
2001	12	12	5	7	0.20610687
2002	15	15	12	3	0.14792899
2003	15	15	5	10	0.13612565
2004	17	17	13	4	0.19166667
2005	5	5	5	0	0.2189781
2006	21	20	16	4	0.12
2007	37	33	28	5	0.18927445
2008	25	25	19	6	0.15789474
2009	5	5	5	0	0.15822785
2010	25	23	23	0	0.12296984
2011	36	29	26	3	0.09160305
2012	22	18	18	0	0.09512761
2013	42	26	24	2	
2014	45	32	27	5	
2015	69	48	29	19	
2016	87	69	29	40	
2017	132	124	24	100	
2018	105	104	17	87	
1999	28	27	15	12	0.44444444
2000	39	37	30	7	0.18918919
2001	135	131	104	27	0.20610687
2002	174	169	144	25	0.14792899
2003	193	191	165	26	0.13612565
2004	247	240	194	46	0.19166667
2005	138	137	107	30	0.2189781

Cabell

2006		279	275	242	33	0.12
2007		328	317	257	60	0.18927445
2008		367	342	288	54	0.15789474
2009		175	158	133	25	0.15822785
2010		447	431	378	53	0.12296984
2011		547	524	476	48	0.09160305
2012		464	431	390	41	0.09512761
2013		487	414	368	46	
2014		541	437	383	54	
2015		621	512	380	132	
2016		728	640	340	300	
2017		828	795	304	491	
2018	WV	696	681	234	447	
1999		5441	4030	3442	588	0.14590571
2000		5848	4400	3785	615	0.13977273
2001		6957	5528	4770	758	0.13712012
2002		9168	7456	6483	973	0.13049893
2003		10237	8517	7461	1056	0.12398732
2004		11449	9857	8577	1280	0.12985695
2005		12570	10928	9612	1316	0.1204246
2006		15338	13723	11589	2134	0.15550536
2007		16391	14408	12796	1612	0.11188229
2008		17307	14800	13149	1651	0.11155405
2009		18322	15597	13523	2074	0.13297429
2010		19155	16651	14583	2068	0.12419674
2011		20588	16917	15140	1777	0.10504227
2012		21036	16007	14240	1767	0.1103892
2013		23153	16235	14145	2090	
2014		27119	18893	14838	4055	
2015		31546	22598	15281	7317	
2016		40778	32445	17087	15358	
2017		46394	40051	17029	23022	
2018	National	45925	40893	14975	25918	

Average of T40.4 only deaths directly attributable (average of average, 17.6)			All T40.4 deaths directly attributable			No T40.4 de
Directly attributable to Rx opioids	Deaths due to non-Rx opioids	Deaths due to non-Prescription Opioids attributable to Prescription Opioids	Directly attributable to Rx opioids	Deaths due to non-Rx opioids	Deaths due to non-Prescription Opioids attributable to Prescription Opioids	Directly attributable to Rx opioids
5	0	0	5	0	0	5
5	0	0	5	0	0	5
12	0	0	12	0	0	5
15	0	0	15	0	0	12
15	0	0	15	0	0	5
17	0	0	17	0	0	13
5	0	0	5	0	0	5
20	1	1	20	1	1	16
33	4	2	33	4	2	28
25	0	0	25	0	0	19
5	0	0	5	0	0	5
23	2	1	23	2	1	23
29	7	4	29	7	4	26
18	4	2	18	4	2	18
24	18	10	26	16	9	24
28	17	9	32	13	7	27
32	37	20	48	21	11	29
36	51	27	69	18	10	29
42	90	48	124	8	4	24
32	73	39	104	1	1	17
27	1	1	27	1	1	15
37	2	1	37	2	1	30
131	4	2	131	4	2	104
169	5	3	169	5	3	144
191	2	1	191	2	1	165
240	7	4	240	7	4	194
137	1	1	137	1	1	107

275	4	2	275	4	2	242
317	11	6	317	11	6	257
342	25	13	342	25	13	288
158	17	9	158	17	9	133
431	16	9	431	16	9	378
524	23	12	524	23	12	476
431	33	18	431	33	18	390
376	111	59	414	73	39	368
393	148	79	437	104	56	383
403	218	116	512	109	58	380
393	335	179	640	88	47	340
391	437	233	795	33	18	304
313	383	205	681	15	8	234
4030	1411	753	4030	1411	753	3442
4400	1448	773	4400	1448	773	3785
5528	1429	763	5528	1429	763	4770
7456	1712	914	7456	1712	914	6483
8517	1720	918	8517	1720	918	7461
9857	1592	850	9857	1592	850	8577
10928	1642	877	10928	1642	877	9612
13723	1615	862	13723	1615	862	11589
14408	1983	1059	14408	1983	1059	12796
14800	2507	1339	14800	2507	1339	13149
15597	2725	1455	15597	2725	1455	13523
16651	2504	1337	16651	2504	1337	14583
16917	3671	1960	16917	3671	1960	15140
16007	5029	2685	16007	5029	2685	14240
14411	8742	4668	16235	6918	3694	14145
15353	11766	6283	18893	8226	4393	14838
16211	15335	8189	22598	8948	4778	15281
19039	21739	11609	32445	8333	4450	17087
19955	26439	14118	40051	6343	3387	17029
18269	27656	14768	40893	5032	2687	14975

Deaths directly attributable		Average of T40.4 only deaths directly attributable (average of average, 17.6 (summed average, 17.1))			Assuming average number 2012 Rx fentanyl deaths	
Deaths due to non-Rx opioids	Deaths due to non-Prescription Opioids attributable to Prescription Opioids	Directly attributable to Rx opioids	Deaths due to non-Rx opioids	Deaths due to non-Prescription Opioids attributable to Prescription Opioids	Directly attributable to Rx opioids	Deaths due to non-Rx opioids
0	0	5	0	0	5	0
0	0	5	0	0	5	0
7	4	12	0	0	12	0
3	2	15	0	0	15	0
10	5	15	0	0	15	0
4	2	17	0	0	17	0
0	0	5	0	0	5	0
5	3	20	1	1	20	1
9	5	33	4	2	33	4
6	3	25	0	0	25	0
0	0	5	0	0	5	0
2	1	23	2	1	23	2
10	5	29	7	4	29	7
4	2	18	4	2	18	4
18	10	24.342	17.658	9	27	15
18	10	27.855	17.145	9	30	15
40	21	32.249	36.751	20	32	37
58	31	35.84	51.16	27	32	55
108	58	41.1	90.9	49	27	105
88	47	31.877	73.123	39	20	85
13	7	27	1	1	27	1
9	5	37	2	1	37	2
31	17	131	4	2	131	4
30	16	169	5	3	169	5
28	15	191	2	1	191	2
53	28	240	7	4	240	7
31	17	137	1	1	137	1

37	20	275	4	2	275	4
71	38	317	11	6	317	11
79	42	342	25	13	342	25
42	22	158	17	9	158	17
69	37	431	16	9	431	16
71	38	524	23	12	524	23
74	40	431	33	18	431	33
119	64	375.866	111.134	59	403	84
158	84	392.234	148.766	79	418	123
241	129	402.572	218.428	117	415	206
388	207	391.3	336.7	180	375	353
524	280	387.961	440.039	235	339	489
462	247	310.437	385.563	206	269	427
1999	1067	4030	1411	753	4030	1411
2063	1102	4400	1448	773	4400	1448
2187	1168	5528	1429	763	5528	1429
2685	1434	7456	1712	914	7456	1712
2776	1482	8517	1720	918	8517	1720
2872	1534	9857	1592	850	9857	1592
2958	1580	10928	1642	877	10928	1642
3749	2002	13723	1615	862	13723	1615
3595	1920	14408	1983	1059	14408	1983
4158	2220	14800	2507	1339	14800	2507
4799	2563	15597	2725	1455	15597	2725
4572	2441	16651	2504	1337	16651	2504
5448	2909	16917	3671	1960	16917	3671
6796	3629	16007	5029	2685	16007	5029
9008	4810	14502.39	8650.61	4619	15550	7603
12281	6558	15531.405	11587.595	6188	16243	10876
16265	8686	16532.207	15013.793	8017	16686	14860
23691	12651	19713.218	21064.782	11249	18492	22286
29365	15681	20965.762	25428.238	13579	18434	27960
30950	16527	19406.978	26518.022	14161	16380	29545

er of 1999- ths/year
Deaths due to non- Prescription Opioids attributable to Prescription Opioids
0
0
0
0
0
0
0
0
1
2
0
0
1
4
2
8
8
20
29
56
45
1
1
2
3
1
4
1

Average of T40.4 only deaths directly attributable (average of average, 17.6)	All T40.4 deaths directly attributable
Total prescription opioid attributable	Total prescription opioid attributable
5	5
5	5
12	12
15	15
15	15
17	17
5	5
21	21
35	35
25	25
5	5
24	24
33	33
20	20
34	35
37	39
52	59
63	79
90	128
71	105
28	28
38	38
133	133
172	172
192	192
244	244
138	138

2
6
13
9
9
12
18
45
66
110
189
261
228
753
773
763
914
918
850
877
862
1059
1339
1455
1337
1960
2685
4060
5808
7935
11901
14931
15777

277	277
323	323
355	355
167	167
440	440
536	536
449	449
435	453
472	493
519	570
572	687
624	813
518	689
4783	4783
5173	5173
6291	6291
8370	8370
9435	9435
10707	10707
11805	11805
14585	14585
15467	15467
16139	16139
17052	17052
17988	17988
18877	18877
18692	18692
19079	19929
21636	23286
24400	27376
30648	36895
34073	43438
33037	43580

No T40.4 deaths directly attributable	Average of T40.4 only deaths directly attributable (average of average, 17.6 (summed average, 17.1)	Assuming average number of 1999-2012 Rx fentanyl deaths/year
Total prescription opioid attributable	Total prescription opioid attributable	Total prescription opioid attributable
5	5	5
5	5	5
9	12	12
14	15	15
10	15	15
15	17	17
5	5	5
19	21	21
33	35	35
22	25	25
5	5	5
24	24	24
31	33	33
20	20	20
34	33.342	35
37	36.855	38
50	52.249	52
60	62.84	61
82	90.1	83
64	70.877	65
22	28	28
35	38	38
121	133	133
160	172	172
180	192	192
222	244	244
124	138	138

262	277	277
295	323	323
330	355	355
155	167	167
415	440	440
514	536	536
430	449	449
432	434.866	448
467	471.234	484
509	519.572	525
547	571.3	564
584	622.961	600
481	516.437	497
4509	4783	4783
4887	5173	5173
5938	6291	6291
7917	8370	8370
8943	9435	9435
10111	10707	10707
11192	11805	11805
13591	14585	14585
14716	15467	15467
15369	16139	16139
16086	17052	17052
17024	17988	17988
18049	18877	18877
17869	18692	18692
18955	19121.39	19610
21396	21719.405	22051
23967	24549.207	24621
29738	30962.218	30393
32710	34544.762	33365
31502	33567.978	32157

